

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA )  
Plaintiff, ) No. 14-CR-00068  
v. ) JUDGE ZOUHARY  
BRIDGESTONE CORPORATION )  
Defendant. )

**UNOPPOSED MOTION TO SEAL ATTACHMENT A TO THE PLEA AGREEMENT**

The United States of America, by its attorneys in the Antitrust Division of the United States Department of Justice, respectfully moves this Court for an Order sealing Attachment A to the Defendant's Plea Agreement. Attachment A will be filed at the hearing on April 30, 2014. The United States requests that the Court seal Attachment A because it includes information concerning an ongoing, non-public investigation, the disclosure of which may jeopardize the investigation. The United States has consulted with counsel for the Defendant prior to filing this Motion, and the Defendant has no objection to it.

Respectfully submitted,

/s Andre M. Geverola

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Andre M. Geverola

## Assistant Chief

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## Trial Attorneys

## United States Department of Justice

## Antitrust Division

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 24th day of April 2014, the foregoing Unopposed Motion to Seal was filed electronically, and to the best of my knowledge, information, and belief, counsel for Defendant Bridgestone Corporation will be notified through the Electronic Case Filing System.

DATED: April 24, 2014 at Chicago, IL

/s Andre M. Geverola  
Andre M. Geverola  
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